

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 1324, 1406 & 1467

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On April 20, 2023, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals* [D.I. 1324] (the “Motion”)².

2. On May 3, 2023, Bloomberg L.P., Dow Jones & Company, Inc., The New York Times Company, and The Financial Times Ltd. (collectively, the “Media Intervenors”) filed the *Media Intervenors’ Objections to the Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain*

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to them in the Motion.

Confidential Information of Customers and Personal Information of Individuals [D.I. 1406] (the “Media Intervenors’ Objection”).

3. On May 9, 2023, the Office of the United States Trustee (the “U.S. Trustee”) filed the *United States Trustee’s Omnibus Objection to (A) Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals, and (B) the Ad Hoc Committee of Non-US Customers of FTX.com’s Motion to File Under Seal (I) the Verified Statement of Eversheds Sutherland (US) LLP and Morris Nichols, Arsht & Tunnell LLP Pursuant to Bankruptcy Rule 2019 and (II) the Supporting Declaration* [D.I. 1467] (the “U.S. Trustee Objection”).

4. On June 8, 2023 and June 9, 2023, the Court held hearings (the “Hearing”) to consider, among other things, the Motion.

5. The Debtors have revised the proposed order (the “Revised Order”) consistent with the Court’s ruling on the Motion at the Hearing, a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Order compared against the proposed order is attached hereto as **Exhibit B**.

6. The Revised Order has been circulated to the U.S. Trustee, the Official Committee of Unsecured Creditors appointed in these chapter 11 cases (the “Committee” and together with the U.S. Trustee and the Media Intervenors as the “Parties”) and the Media Intervenors. The Parties have reviewed the Revised Order and attachments thereto and believe the Revised Order accurately reflects the Court’s ruling on the Motion at the Hearing. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

7. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: June 15, 2023
Wilmington, Delaware

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